

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

JACKIE EPPS, as Putative  
Administratrix of the Estate of  
ANNIE MAE SETZER,

Plaintiff,

vs.

JOHNSON & JOHNSON,  
JOHNSON & JOHNSON  
CONSUMER, INC., JOHNSON  
& JOHNSON CONSUMER  
COMPANIES, INC., JOHNSON  
& JOHNSON CONSUMER  
PRODUCTS COMPANY, and  
IMERYS TALC AMERICA,  
INC., F/K/A LUZENAC  
AMERICA, INC.

Defendants.

Civil Action No.  
1:16-CV-03652-ODE

**JURY TRIAL DEMANDED**

**DEFENDANT IMERYS TALC AMERICA, INC.'S CERTIFICATE OF  
INTERESTED PERSONS AND CORPORATE DISCLOSURE  
STATEMENT**

Pursuant to Rule 3.3 of the Local Rules of the United States District Court for the Northern District of Georgia and Federal Rule of Civil Procedure 7.1, Defendant IMERYS TALC AMERICA, INC., f/k/a LUZENAC AMERICA, INC. (“Defendant Imerys”), a Delaware Corporation, states:

1. The undersigned counsel of record for Defendant Imerys certifies that the following is a full and complete list of all parties in this action, including any

parent corporation and any publicly held corporation that owns 10% or more of the stock of Defendant:

- a. Plaintiff: Jackie Epps
  - b. Defendant Imerys: Imerys Mineral Holding Limited (UK) owns 100% of the shares of Imerys Talc America, Inc. Imerys USA, Inc., owns 100% of the shares of Imerys Minerals Holding Limited (UK). Imerys S.A. owns 100% of the shares of Imerys USA, Inc. Imerys S.A. is publicly traded on NYSE Euronext Paris.
  - c. Defendant Johnson & Johnson : Unknown
  - d. Defendant Johnson & Johnson Consumer Inc. f/k/a Johnson & Johnson Consumer Companies, Inc.: Unknown
2. The undersigned further certifies that the following is a full and complete list of all other persons, associations, firms, partnerships, or corporations having either a financial interest or other interest which could be substantially affected by the outcome of this particular action:

- a. Plaintiff: Jackie Epps
- b. Defendant Imerys: Imerys Mineral Holding Limited (UK) owns 100% of the shares of Imerys Talc America, Inc. Imerys USA, Inc., owns 100% of the shares of Imerys Minerals Holding Limited (UK). Imerys S.A. owns 100% of the shares of Imerys USA, Inc. Imerys S.A. is publicly traded on NYSE Euronext Paris.
- c. Defendant Johnson & Johnson : Unknown

- d. Defendant Johnson & Johnson Consumer Inc. f/k/a Johnson & Johnson Consumer Companies, Inc.: Unknown

3. The undersigned further certifies that the following is a full and complete list of all persons serving as attorneys for the parties in this proceeding:

- a. Plaintiff: Thomas F. Cuffie  
THE CUFFIE LAW FIRM  
3080 Campbellton Road Southwest  
Atlanta, GA 30311
- b. Defendant Imerys: Leslie K. Eason  
GORDON & REES LLP  
3455 Peachtree Road  
Suite 1500  
Atlanta, Georgia 30326
- c. Defendant Johnson & Johnson: Unknown
- d. Defendant Johnson & Johnson Consumer Inc.  
f/k/a Johnson & Johnson Consumer  
Companies, Inc.: Unknown

Submitted this 24th day of October, 2016.

**GORDON & REES LLP**

/s/ Leslie K. Eason  
Leslie K. Eason  
Georgia Bar No. 100186  
3455 Peachtree Road, Suite 1500  
Atlanta, Georgia 30326  
Tel: (404) 869-9054  
Fax: (678) 389-8475  
leason@gordonrees.com

**Certificate of Service**

I hereby certify that on 24th day of October, 2016, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system to:

Thomas F. Cuffie  
THE CUFFIE LAW FIRM  
3080 Campbellton Road Southwest  
Atlanta, GA 30311  
tcuffie@cuffielawfirm.com

*Attorneys for Plaintiff*

/s/ Leslie K. Eason  
Leslie K. Eason